

RE MARKS

Reconsideration and allowance of the subject application are respectfully solicited.

Claims 1, 6-9, 16, 18, and 19 are pending, with Claims 1 and 18 being independent.

Claims 1, 9 and 18 have been amended. Support for the amendments to the claims can be found in the original specification at least at page 16, line 23 to page 17, line 2 and page 18, lines 1-17. Of course, the claims are not intended to be limited in scope to this particular embodiment.

Claims 1, 6-9, 16, 18, and 19 were rejected under 35 U.S.C. § 103 over WO 02/077865 A1 (Aridome et al.) in view of US 6,529,948 (Bowman-Amuah). This rejection is respectfully traversed.

Aridome et al. is directed to an electronic camera that can record an index file to hierarchically store index data of files recorded on a recording medium. The Office Action takes the position that Aridome et al. generates first reference type data and second type reference data, but does not teach that the second reference type data describes the first reference type data as a reference target. Although that feature is no longer explicitly cited in the independent claims, it is respectfully submitted that Aridome et al. does not disclose or suggest at least generating second reference type data different from first reference type data by editing the first reference type data recorded on the recording medium in accordance with an instruction without editing video data itself recorded on the recording medium, thereby providing an editing result corresponding to the editing of the video data, as is recited in the independent Claims 1 and 18.

Thus, Aridome et al. fails to disclose or suggest important features of the present invention recited in the independent claims.

Bowman-Amuah describes a system for retrieving multiple business objects across a network. Bowman-Amuah was cited for teaching the deficiencies of the second reference type

data. However, Applicant submits that the reference type data in Bowman-Amuah, such as SNIL, describes data of audio, video or the like as a reference target. This citation does not describe, as a reference target, the first reference type data which describes the data of audio, video or the like. Neither Bowman-Amuah nor Aridome et al. discloses or suggests a relationship among video data, first reference type data describing the video data as the reference target, and the second reference type data describing the first reference type data as the reference target. Further, Applicant submits that Bowman-Amuah is silent with regard to generation timing of the second reference type data, which is generated in accordance with an instruction to edit the video data. In Bowman-Amuah, the index data is generated at a time of formatting of a recording medium or after photographing. Thus, Bowman-Amuah fails to remedy the deficiencies of Aridome et al. noted above with respect to the independent claims.

Accordingly, independent Claims 1 and 18 are patentable over the citations of record. Reconsideration and withdrawal of the § 103 rejection are requested.

The dependent claims are also submitted to be patentable because they set forth additional aspects of the present invention and are dependent from independent claims discussed above. Therefore, separate and individual consideration of each dependent claim is respectfully requested.

Applicant submits that this application is in condition for allowance, and a Notice of Allowance is respectfully requested.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address given below.

Respectfully submitted,

/Mark A. Williamson/
Mark A. Williamson
Attorney for Applicant
Registration No. 33,628

FITZPATRICK, CELLA, HARPER & SCINTO
1290 Avenue of the Americas
New York, NY 10104-3800
Facsimile: (212) 218-2200
DSG/MAW/jjr/cdk